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*Attorneys for Defendants*

**UNITED STATES BANKRUPTCY COURT FOR  
THE SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION  
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT  
SECURITIES LLC,

Defendant.

Adv. Pro. No. 08-01789 (SMB)  
SIPA LIQUIDATION  
(Substantively Consolidated)

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation of  
Bernard L. Madoff Investment Securities LLC

Plaintiff,

v.

Adv. Pro No. 10-05128 (SMB)

JABA ASSOCIATES LP; ESTATE OF JAMES  
GOODMAN; AUDREY GOODMAN, in her  
capacity as a General Partner of JABA  
Associates LP and in her capacity as Personal  
Representative of the Estate of James Goodman;  
BRUCE GOODMAN, in his capacity as a General  
Partner of JABA Associates LP; and ANDREW  
GOODMAN, in his capacity as a General Partner of  
JABA Associates LP,

Defendants.

**DECLARATION OF HELEN DAVIS CHAITMAN IN SUPPORT OF DEFENDANTS'  
MOTION TO WITHDRAW THE REFERENCE**

HELEN DAVIS CHAITMAN hereby declares, under penalty of perjury pursuant to 28 U.S.C. § 1746, as follows:

1. I am a member of the bars of New York and New Jersey, and of this Court. I am a member of Chaitman LLP, counsel for Defendants JABA Associates LP; Estate of James Goodman; Audrey Goodman, in her capacity as a General Partner of JABA Associates LP and in her capacity as Personal Representative of the Estate of James Goodman; Bruce Goodman, in his capacity as a General Partner of JABA Associates LP; and Andrew Goodman, in his capacity as a General Partner of JABA Associates LP (“Defendants”).

2. I submit this Declaration in support of Defendants’ motion to withdraw the reference pursuant to 28 U.S.C. § 157(d) and Rule 5011 of the Federal Rules of Bankruptcy Procedure.

3. Attached hereto as **Exhibit A** is a true and accurate copy of the Complaint filed by the Trustee, dated December 2, 2010.

4. Attached hereto as **Exhibit B** is a true and accurate copy of Defendants’ Answer and Affirmative Defenses, dated September 16, 2015.

Dated: New York, New York  
May 15, 2020

/s/ Helen Davis Chaitman  
Helen Davis Chaitman